

Exhibit 49

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

JILL STEIN, RANDALL REITZ, ROBIN HOWE,
SHANNON KNIGHT, EMILY COOK, and
KIMBERLY KUPKA

Plaintiffs,

v.

No. 16-CV-8287 (PD)

PEDRO A. CORTÉS, in his official capacity as
Secretary of the Commonwealth; and JONATHAN
MARKS, in his official capacity as Commissioner
of the Bureau of Commissions, Elections, and
Legislation,

Defendants.

DECLARATION OF DOUGLAS E. LIEB

I, DOUGLAS E. LIEB, hereby declare under penalty of perjury:

1. I am an attorney admitted to practice in California, New York, and the United States District Courts for the Southern and Eastern Districts of New York. I am admitted *pro hac vice* in this action.

2. I am an associate at the firm of Emery Celli Brinckerhoff & Abady LLP, counsel for Plaintiffs in this action and counsel for Jill Stein and the Jill Stein for President Campaign (the "Campaign") in connection with 2016 election recounts in Pennsylvania, Michigan, and Wisconsin.

3. On November 28, 2016, I was helping voters file recount petitions in Chester County when I received a call from a volunteer explaining that the Montgomery County Board of Elections was rejecting voter petitions.

4. I went to the Montgomery County Board of Elections in Norristown and spoke with two county attorneys. They explained their position that the voters' petitions were untimely and needed to be filed in the Court of Common Pleas. They said that the Board of Elections would not accept the original petitions but would accept a "service copy" of the petitions.

5. At the instruction of these County officials, I coordinated the filing of the petitions across the street with the Prothonotary in the Court. The Prothonotary advised us that a \$269.50 filing fee was required for each complete petition supported by three voter affidavits.

6. The Campaign paid the cost of filing 78 voter petitions with the Prothonotary, or \$21,021.00 total.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 14, 2017



DOUGLAS E. LIEB